

IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

OHIO VALLEY CONCRETE LLC

*Plaintiff,*

v.

GRUPPO EF TECNOLOGIE USA, LLC

and

AIR LIQUIDE ADVANCED  
TECHNOLOGIES U.S. LLC

*Defendants.*

Case No. 25-cv-01531

Judge Benita Y. Pearson

**DECLARATION OF CITIZENSHIP**

Defendant Air Liquide Advanced Technologies U.S. LLC (“Air Liquide”) submits the within Declaration of Citizenship pursuant to the Court’s Show Cause Order (ECF No. 5) and states:

1. The Plaintiff Ohio Valley Concrete LLC (“OVC”) is a Limited Liability Company organized under the laws of Ohio and has a principal place of business at 13857 Columbiana Canfield Road, Columbiana, Ohio.

a. Counsel for OVC has advised that OVC is a single member Limited Liability Company and that its single member owner, Andrew VanPelt, is a citizen of the state of Ohio. See Plaintiff’s Jurisdictional Statement, ECF #6. Therefore, OVC is an Ohio citizen.

2. Air Liquide is now, and has been continuously at all relevant times, a Limited Liability Company organized under the laws of Delaware and has its principal place of business at 9811 Katy Freeway, Ste. 100, Houston, Texas 77024-1274.

a. Air Liquide's sole member is Air Liquide USA LP, which is a Delaware Limited Partnership.

b. Air Liquide USA LP's partners are Air Liquide USA GP LLC and Air Liquide USA LP LLC, both of which are Delaware Limited Liability Companies.

c. Air Liquide USA GP LLC and Air Liquide USA LP LLC have one sole member, American Air Liquide Holdings, Inc., which is a Delaware Corporation.

d. The principal place of business for Air Liquide USA LP, Air Liquide USA GP LLC, Air Liquide USA LP LLC, and American Air Liquide Holdings, Inc. is 9811 Katy Freeway, Ste. 100, Houston, Texas 77024-1274.

Air Liquid and the above Air Liquid ownership entities are therefore Texas and/or Delaware citizens.

3. Co-Defendant Gruppo EF Tecnologie USA, LLC ("Gruppo") is a Limited Liability Company organized under the laws of Delaware and has its principal place of business at 200 Broadway, 3<sup>rd</sup> Floor, New York, NY 10038.

a. Counsel for Gruppo has advised that Gruppo is a single member Limited Liability Company and that its single member owner is a citizen of Italy domiciled in New York. Therefore, Gruppo is a New York and/or Italian citizen.

Respectfully submitted,

/s/ Joseph R. Spoonster

Joseph R. Spoonster (#0070863)

Nicholas J. Horrigan (#0087345)

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CERTIFICATE OF SERVICE

I hereby certify that on this 6<sup>th</sup> day of August, 2025, a copy of the foregoing document was submitted for electronic filing. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Clerk of Court's E-Filing System.

I hereby certify that a copy of the foregoing was served by email transmission and/or first class mail, postage prepaid this ... day of August, 2025 to:

Gruppo EF Tecnologie USA, LLC  
200 Broadway 3<sup>rd</sup> Floor  
New York, NY 10038  
c/o Brian Lehman, Esq.  
brianl@wearegrupp.com

/s/ Joseph R. Spoonster

Joseph R. Spoonster (#0070863)